

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**\$656,399.10 IN UNITED STATES  
CURRENCY.**

Defendant.

**Case No. 23-00020-CV-W-RK**

**NOTICE OF COMPLAINT FOR FORFEITURE**

To: Debra S. Ballard  
504 East Hillside Avenue  
Des Moines, IA 50315

1. DATE OF NOTICE: January 11, 2023

2. FORFEITURE COMPLAINT: On January 10, 2023, the United States of America filed a civil complaint seeking forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(c), in the United States District Court for the Western District of Missouri against the following defendant property:

\$656,399.10 in United States currency.

3. FILING OF A VERIFIED CLAIM: Pursuant to Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property **must** file a verified claim within **35** days after the date of this notice or the date of delivery, if personally served.

4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; and (C) be signed by the claimant under penalty of perjury (*see* 28 U.S.C. § 1746).

5. FILING OF AN ANSWER: If you file a verified claim, you **must** then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing the verified claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The verified claim and answer **must** be filed with the Office of the Clerk, United States District Court for the Western District of Missouri, 400 E. 9<sup>th</sup> Street, Kansas City, Missouri 64106 and a copy of the claim and answer or motion must be sent to John Constance, Assistant United States Attorney, 400 E. 9<sup>th</sup> Street, Fifth Floor, Kansas City, Missouri 64106.

7. Any claim you filed with the seizing agency in an administrative proceeding and any petition you filed in a related criminal action are **NOT** a substitute for the claim you must file in this action which meets the requirements of and within the time allowed under Rules G(4) and G(5), as described above.

**Failure to follow the requirements set forth above may result in judgment by default taken against you for relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.**

Respectfully submitted,

Teresa A. Moore  
United States Attorney

By: /s/ John Constance  
John Constance  
Assistant United States Attorney  
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